

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CLIFFORD MICHEL *et al.*, §
Plaintiffs, § Civil Action 1:21-cv-681
vs. §
WORKRISE TECHNOLOGIES INC. *et al.*, §
Defendants. §

MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC (together, “Defendants”) file this Motion to Withdraw and Substitute Counsel (the “Motion”) and respectfully show the Court as follows:

I. MOTION

1. David R. Anderson and Rachel Z. Ullrich with the law firm of Ford Harrison, LLP previously appeared as counsel of record for Defendants in the above-referenced matter.

2. Alana K. Ackels, Jay M. Wallace, and Brent D. Hockaday with the law firm of Bell Nunnally & Martin, LLP have been retained and, on July 17, 2023, filed a notice of appearance in this case on behalf of Defendants.

3. Defendants now desire Ms. Ackels, Mr. Wallace, and Mr. Hockaday to substitute in place of Mr. Anderson, Ms. Ullrich, and the law firm of Ford Harrison, LLP

as their counsel in this matter. Defendants request the Court approve the withdrawal of Mr. Anderson, Ms. Ullrich, and Ford Harrison, LLP. Ms. Ackels, Mr. Wallace, and Mr. Hockaday will represent Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC in this matter moving forward. This substitution of counsel is not sought for purposes of delay.

4. All further notices, correspondence, and pleadings should include notice to:

Alana K. Ackels
State Bar No. 24066760
aackels@bellnunnally.com
Jay M. Wallace
jwallace@bellnunnally.com
State Bar No. 20769200
Brent D. Hockaday
State Bar No. 24071295
bhockaday@bellnunnally.com

Bell Nunnally & Martin LLP
2323 Ross Ave., Ste. 1900
Dallas, Texas 75201-2721
214-740-1465 (Phone)
214-740-5765 (Fax)

5. Defendants approve and consent to the substitution of Ms. Ackels, Mr. Wallace, and Mr. Hockaday as counsel of record for Defendants in this matter.

6. Plaintiffs oppose this Motion.

II. CONCLUSION

Defendants respectfully request the Court enter an Order permitting Mr. Anderson, Ms. Ullrich, and Ford Harrison, LLP to withdraw as counsel in this matter, substituting Ms. Ackels, Mr. Wallace, and Mr. Hockaday with the firm of Bell Nunnally & Martin, LLP as counsel for Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC. Defendants further request the Court grant Defendants such other relief to which they may be entitled at law or in equity.

Dated: July 25, 2023.

Respectfully submitted,
BELL NUNNALLY & MARTIN LLP

By: /s/Alana K. Ackels
Alana K. Ackels
State Bar No. 24066760
aackels@bellnunnally.com
Jay M. Wallace
jwallace@bellnunnally.com
Texas Bar No. 20769200
Brent D. Hockaday
Texas Bar No. 24071295
bhockaday@bellnunnally.com

2323 Ross Avenue, Suite 1900
Dallas, Texas 75201
Tel. (214) 740-1400
Fax (214) 740-1499

**COUNSEL FOR DEFENDANTS WORKRISE
TECHNOLOGIES INC. AND
HCS RENEWABLE ENERGY LLC**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that she conferred with counsel for Plaintiff and Plaintiffs are opposed to this Motion.

/s/ Alana K. Ackels _____

Alana K. Ackels

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2023, a true and correct copy of the Notice of Appearance was served by and through CM/ECF on all known counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Alana K. Ackels _____

Alana K. Ackels

7484508_1.DOCX